



DOCKET FILE CCY ORIGINAL

7852 Walker Drive, Suite 200, Greenbelt, MD 20770

phone: 301-459-7590, fax: 301-577-5575

internet: www.jsitel.com, e-mail: jsi@jsitel.com

FILED/ACCEPTED

FEB 29 2008

Federal Communications Commission
Office of the Secretary

BY HAND DELIVERY

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

EB Docket No. 06-36

EB-06-TC-060

Re: **CERTIFICATION OF CPNI COMPLIANCE FILING - FEBRUARY 29, 2008**

Ringgold Telephone Company

499 Filer ID # 806097

Ringgold Telephone Long Distance, Inc.

499 Filer ID # 823628

Dear Ms. Dortch:

On behalf of the telecommunications carriers listed above, John Staurulakis (JSI), their consultant is filing the attached CPNI Certification together with the statement of procedures for operational compliance with FCC's CPNI rules.

Sincerely,

Scott Duncan
JSI Staff Director-Regulatory Affairs
sduncan@jsitel.com

Attachment

Copies: 4 additional copies to Secretary
2 copies to Telecommunications Consumers Division
Best Copy and Printing (BCPI)

No. of Copies rec'd 014
List ABCDE

Echelon Building II, Suite 200
9430 Research Boulevard, Austin, Texas 78759
Phone: 512-338-0473
Fax: 512-346-0822

Ergandale Corporate Center, Suite 310
1880 Corporate Center Curve
Eagan, Minnesota 55121
Phone: 651-452-2660
Fax: 651-452-1909

547 South Oakview Lane
Bountiful, UT 84010
Phone: 801-294-4576
Fax: 801-294-5124

4625 Alexander Drive, Suite 135
Alpharetta, Georgia 30022
Phone: 770-569-2105
Fax: 770-410-1608

RINGGOLD TELEPHONE COMPANY

P. O. Box 869 Ringgold, GA 30736 706-965-2345

Annual 47 C.F.R. § 64.2009(e) CPNI CertificationEB Docket 06-36**FILED/ACCEPTED**
FEB 29 2008
Federal Communications Commission
Office of the Secretary

Annual 64.2009(e) CPNI Certification for 2007

Date signed: February 26, 2008

Names of Companies Covered by this Certification:499 Filer ID

Ringgold Telephone Company

806097

Ringgold Telephone Long Distance, Inc.

823628

Name of signatory: Alice Evitt Bandy

Title of signatory: President

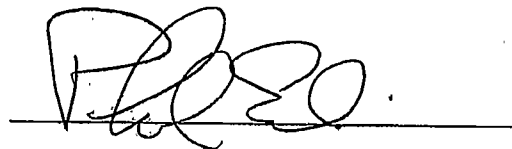
I, Phil Erli, certify that I am an officer of the affiliated companies named above (collectively and individually "Company", and acting as an agent of the Company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the CPNI rules of the Federal Communications Commission ("Commission"). See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The Company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in 2007 or related to 2007. The Company is not aware of any attempts by pretexters to access the CPNI of Company customers and thus has not had to take any actions against data brokers. The Company has taken steps to protect CPNI from unauthorized access and has described these steps in the accompanying statement.

The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

I hereby certify that the statements contained within this certification and the accompanying statement are accurate, complete and in accordance with FCC rules.



Attachment

RINGGOLD TELEPHONE COMPANY

Ringgold Telephone Company, Inc. 499 Filer ID 806097
Ringgold Telephone Long Distance, Inc. 499 Filer ID 823628

P. O. Box 869 Ringgold, GA 30736 706-965-2345

2007 ANNUAL STATEMENT OF FCC CPNI RULE COMPLIANCE
February 26, 2008

This statement accompanies the Company's 2007 Customer Proprietary Network Information ("CPNI") Certification, as required by Section 64.2009(e) of the Federal Communications Commission's ("FCC's") rules, for the purpose of explaining how the operating procedures of the Company ensure compliance with Part 64, Subpart U of the FCC's rules. *See* 47 C.F.R. § 64.2001 *et seq.*

All subsequent references to rule Sections refer to rules under Part 64, Subpart U unless indicated otherwise.

1. Identification of CPNI

The Company has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the Section 64.2003(g) and Section 222(f)(1) of the Communications Act of 1934 as amended (47 U.S.C. § 222(f)(1)).

2. Identification of Services Affected by CPNI Rules

The Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services that affect how the Company uses CPNI.

3. Identification of Permissible Uses of CPNI without Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI not requiring customer authorization under Section 64.2005.

4. Identification of Uses of CPNI Requiring Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under Section 64.2007.

5. Customer Notification and Authorization Process

The Company has established procedures, and trained employees responsible for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and approval requirements under Section 64.2008. The Company has complied with the notice requirements for Opt-Out. The Company does not provide CPNI to other parties and thus has not used the opt-in approval process.

Ringgold Telephone Company
February 26, 2008

6. Record of Customer CPNI Approval/Non-Approval

The Company has developed and utilizes a system for maintaining readily accessible record of whether and how a customer has responded to Opt-Out approval as required by Section 64.2009(a).

7. Procedures Protecting Against Disclosure of CPNI

During 2007, the Company implemented procedures for compliance with new Section 64.2010 including, but not limited to the following:*

Authentication of customers before disclosing CPNI on customer-initiated telephone contacts or business office visits.

The Company has implemented procedures to provide immediate notification to customers of account changes, including changes in address-of-record and attempts at access to CPNI through use of back-up methods due to forgotten passwords.

*The Company does not provide customers with on-line access to customer account information.

8. Actions Taken Against Data Brokers and Responses to Customer Complaints

Pursuant to Section 64.2009, the Company makes the following explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI:

| | |
|------------------------|--|
| <u>Not applicable.</u> | No actions taken against data-brokers. |
| | No customer complaints received. |

9. Disciplinary Process

The Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under Section 64.2009(b).

10. Supervisory Review Process for Outbound Marketing

The Company has established a supervisory review process regarding its compliance with the rules for outbound marketing situations as required in Section 64.2009 (c) and (d). Prior to any outbound marketing effort, sales personnel must obtain supervisory approval of the proposed outbound marketing use. Any approval of CPNI use for outbound marketing efforts is limited to CPNI not requiring prior customer authorization or, where prior customer authorization is required, CPNI of customers having given the Company prior approval. The Company maintains records of its compliance for a minimum of one year.

11. Procedures for Notifying Law Enforcement of CPNI Security Breaches

The Company has adopted procedures to comply with Section 64.2011 for notifying law enforcement of CPNI security breaches, together with related recordkeeping and deferred notification to customers.